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December 9, 2024

BY ECF

Hon. Mae A. D'Agostino, USDJ
Hon. Daniel J. Stewart, USMJ
United States District Court, NDNJ
James T. Foley U.S. Courthouse
445 Broadway, Room 112
Albany, New York 12207

Re: United States v. One 2003 Ferrari Enzo AB Version E, et al.
Case No. 24-cv-1345 (MAD/DJS)
Request for Extension of Time to Answer Complaint

Dear Judges D'Agostino and Stewart:

We are counsel to Prime Capital Ventures, LLC ("Prime"), in connection with its chapter 11 bankruptcy case currently pending before the U.S. Bankruptcy Court for the Northern District of New York (the "Bankruptcy Court") under Case No. 24-11029 (REL). We write on behalf of Prime and Christian H. Dribusch (the "Trustee"), in his capacity as chapter 7 bankruptcy trustee of the estate of Kris Daniel Roglieri ("Roglieri"), whose bankruptcy is pending before the Bankruptcy Court under Case No. 24-10157 (REL), to respectfully request an extension of Prime's and the Trustee's time to answer the complaint (the "Complaint") filed by the United States of America (the "Government") commencing the above-referenced civil forfeiture action (the "Forfeiture Action") for 60 days to February 11, 2025.

Both Prime and the Trustee believe that each may have an interest in certain assets that are the subject of the Forfeiture Action, most of which were titled in Roglieri's name. Prime and the Trustee are actively in discussions with the Government regarding the potential resolution of such interests and related claims. Prime and the Trustee would appreciate an additional opportunity to investigate such interests and claims, discuss a potential resolution of such interests and claims with the Government, and if a resolution is reached, obtain the Bankruptcy Court's approval of such resolution, before having to take a position in the Forfeiture Action.

Based upon the foregoing, **Prime and the Trustee each respectfully request an extension of time to answer or respond to the Complaint, or otherwise assert a claim to subject property in the Forfeiture Action, to February 11, 2025.** Prime and the Trustee have discussed this request with the Government and the Government has consented to the requested extension.

Hon. Mae A. D'Agostino, USDJ

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For ease of reference, the answers to the four questions set forth in Rule No. 1 of the *Individual Rules and Practices of Hon. Mae A. D'Agostino*, are as follows:

1. **Original Date/Deadline** – Friday, December 13, 2024
2. **Number of Previous Requests for Adjournment/Extension** – None
3. **Whether Previous Requests Were Granted/Denied** – Not Applicable
4. **Whether Adversary Consents** – Yes

We thank you very much for your time and courtesy in considering this request. Please contact me should you require any additional submissions in order to render a decision in this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Fred Stevens', with a stylized, flowing script.

Fred Stevens

FS:moh

cc: Elizabeth A. Conger
Assistant United States Attorney
Email: Elizabeth.Conger@usdoj.gov

CONSENTED AND AGREED:

By: /s/ Christian H. Dribusch
Christian H. Dribusch
Chapter 7 Trustee of Kris Daniel Roglieri